

Victorino DLG. Torres, Esq.
TORRES BROTHERS, LLC.
Attorneys At Law
P.O. Box 501856
Bank of Guam Bldg., 3rd Floor
Saipan, MP 96950
Tel: 670-233-5504/06
Attorneys for Mr. James A. Santos

UNITED STATES DISTRICT COURT
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

Criminal Case No. 08-00020.

Plaintiff,

v.

MOTION TO EXTEND MOTION
DEADLINE

TIMOTHY P. VILLAGOMEZ, ANTHONY
C. GUERRERO, JOAQUINA V. SANTOS
AND JAMES A. SANTOS,

Defendant.

MOTION

COME NOW, Defendant James A. Santos through counsel Victorino DLG. Torres from the Torres Brothers, LLC. and hereby requests this Court for an extension on the motion deadline to **September 22, 2008** for the following reasons:

1. This Motion is unopposed by the Plaintiff. *See, Declaration of Victorino DLG. Torres.*
2. That the Pre-trial Motion deadline is August 25, 2008.
3. That undersigned counsel was newly retained to represent Mr. James A. Santos and has recently substituted Mr. Colin Thompson.
4. That on or about August 21, 2008, undersigned counsel spoke with U.S. Assistant Attorney General Mr. Eric O'Malley and requested for an extension; Mr.

1 O'Malley agreed with an extension. *See, Declaration of Victorino DLG. Torres.*

2 5. Than on August 26, 2008, undersign counsel again spoke with Mr. O'Malley and
3 requested for an extension to **September 22, 2008**; Mr. O'Malley agreed with the
4 extension. *See, Declaration of Victorino DLG. Torres.*

5 6. That in light on the numerous witnesses and voluminous documents and newly
6 retained counsel, this request for extension is needed to properly defend Mr.
7 Santos.
8

9 Respectfully submitted this 26th day of August, 2008.

10 TORRES BROTHERS, LLC.

11
12 /s/
13 VICTORINO DLG. TORRES, Attorney for Mr.
14 James A. Santos
15
16
17
18
19
20
21
22
23
24
25
26
27
28